



Re: Reifler, Case No. 17-35075 (KYP) pls print

From Bradley Reifler <breifler@gmail.com>
Date Mon 2/17/2025 9:42 AM
To NYSBml_Paek.Chambers <paek.chambers@nysb.uscourts.gov>

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Sent by mail as well.

The Hon. Kyu Y. Paek
United States Bankruptcy Court
355 Main Street
Poughkeepsie, NY 12601

**Re: In re Reifler, Case No. 17-35075 (KYP)
Letter Motion Joinder in Motion to
Abandon Asset under Rule 6007**

Your Honor:

My name is Bradley Reifler, and I am the debtor in this bankruptcy, as well as a member and former manager of Forefront Partners, LLC, a plaintiff in Talking Capital Windup v. Omanoff, Index No. 650973/2017 (the “State Case”). I declared personal bankruptcy in January 2017, and now, over eight years after the judge denied my bankruptcy petition, the trustee has still not closed the file.

The trustee's unwillingness to close the case includes her lack of responsiveness in abandoning Forefront Partners as an asset of the estate.

The plaintiffs in the State Case made a motion on February 7, 2025, in this case, moving to compel the trustee to abandon the membership interest in Forefront Partners, LLC, or, alternatively, to recognize the existence of the properly appointed manager of Forefront Partners. I would like to join that motion.

My company Forefront Partners borrowed money from several individuals in 2015/2016, with the confidence to repay it coming from the business

revenues generated by Talking Capital, the business that Rodney Omanoff et al. were found to have stolen away. I used my remaining resources at the time and sought to bring an action against Mr. Omanoff. In February 2017, the State Case was filed. When all available resources were used up I found an accomplished law firm who would take the action on contingency. That law firm successfully obtained a summary judgment order against Omanoff et al. for liability, and then a jury verdict and judgment for more than \$26 million. Now the trustee's failure to either abandon Forefront Partners or confirm the manager I appointed in 2022 threatens the potential recovery of millions.

My sole purpose in causing Forefront Partners and its subsidiaries to pursue the State Case has been to return the funds to the individual investors who originally lent their money to Forefront Partners. After this is done, any excess funds owed to the creditors of Forefront Partners would go to my creditors.

The trustee's inaction puts this plan at great risk. There will be irreparable harm if the trustee does not abandon the asset or have an independent manager (we have suggested two, and I appointed one – Will McKettrick – in 2022) move the case forward against Omanoff et al. The theft of Talking Capital occurred over nine years ago, and although the road has been bumpy, the State Case plaintiffs have moved forward. The trustee holds the checkered flag in a drawer, and it simply needs to be forcibly opened if necessary.

I respectfully ask you to order the trustee to either abandon Forefront Partners, or approve Will McKettrick as manager. Thank you, Your Honor.

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Sent from Gmail Mobile

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